



WILTSHIRE
& GRANNIS LLP

February 27, 2013

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Vonage's Petition for Limited Waiver*, CC Docket No. 99-200

Dear Ms. Dortch:

On February 25, 2013, the undersigned, along with Ed Mulligan, Craig Lennon, Michael Doherty, and Brendan Kasper of Vonage, and Kristine Devine of this firm, spoke by phone with Michael Steffen, Legal Advisor to the Chairman, and Lisa Gelb, Bill Dever, and Travis Litman of the Wireline Competition Bureau, to discuss Vonage's above-captioned request for direct access to numbering resources.

During that phone call, Vonage reiterated the importance to Vonage of direct access to numbers. Vonage urged the Commission to move forward with Vonage's requested waiver and to do so in a manner that will foster the success of efforts to establish IP interconnection arrangements that allow the provision of higher quality and less costly service. Specifically, Vonage explained that any waiver should provide sufficient scope and certainty that other providers will have incentives to negotiate agreements to interconnect and exchange traffic with Vonage on an IP basis. Vonage described the volume and distribution of numbers it receives from its numbering partners, and explained how both the volume of traffic exchanged with a particular provider and geographic scope impact the incentive of that provider to enter into an agreement to exchange traffic on an IP basis.

If you have questions or require any additional information, please do not hesitate to contact me at (202) 730-1346.

Sincerely,

A handwritten signature in dark ink, appearing to read 'BDS' followed by a stylized flourish.

Brita D. Strandberg
Counsel to Vonage Holdings Corp.

cc: Michael Steffen
Bill Dever
Lisa Gelb
Travis Litman